

Daniel S. Mount (State Bar No. 077517) (dmount@mount.com)
Alfredo A. Bismonte (State Bar No. 136154) (abismonte@mount.com)
Bobby T. Shih (State Bar No. 210957) (bshih@mount.com)
MOUNT & STOEKLER P.C.
333 West San Carlos Street, 17th Floor
San Jose, CA 95110
Tel: (408) 279-7000
Fax: (408) 998-1473

Michael J. Hughes (State Bar No. 076836) (michaelh@iplo.com)
INTELLECTUAL PROPERTY LAW OFFICES
1901 South Bascom Avenue, Suite 660
Campbell, CA 95008
Tel: (408) 558-9950
Fax: (408) 558-9960

Attorneys for Plaintiff
PHOTOFLEX PRODUCTS, INC.

SEDGWICK, DETERT, MORAN & ARNOLD LLP
WARREN KRAUSS Bar No. 49568
JAMES YUANXIN LI Bar No. 135128
One Market Plaza
Steuart Tower, 8th Floor
San Francisco, California 94105
Telephone: (415) 781-7900
Facsimile: (415) 781-2635

Attorneys for Defendant
CIRCA 3, LLC dba amvona.com

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

PHOTOFLEX PRODUCTS, INC.,

Plaintiff,

v.

CIRCA 3 LLC dba AMVONA.COM,

Defendant.

CASE NO. C04 03715 JSW

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING DEADLINE FOR
FILING MOTION TO STAY**

1 WHEREAS, the Case Management Conference ("CMC") in this matter took place on
2 Friday, December 9, 2005.

3 WHEREAS, at the CMC, the Court set a date of January 31, 2006, as the deadline for
4 filing any Motions to Stay.

5 WHEREAS, Defendant CIRCA 3 LLC dba Amvona.com ("Amvona.com") anticipates
6 that it will file a Motion to Stay in conjunction with its Petition for Re-Examination of the
7 Plaintiff's patent at issue. The Petition for Re-Examination will be based, in part, on Plaintiff's
8 (1) Disclosure of Asserted Claims and Preliminary Infringement Contentions and (2) Document
9 Production Accompanying Disclosure. See, Patent Local Rules 3-1 and 3-2, respectively.

10 WHEREAS, Plaintiff served its Disclosure of Asserted Claims and Preliminary
11 Infringement Contentions on Tuesday, January 16, 2006.

12 WHEREAS, Plaintiff has not yet produced its Document Production Accompanying
13 Disclosure, if any, but anticipates doing so, or confirming no additional documents exist, during
14 the week of January 23, 2006.

15 The parties hereby stipulate to and request the following:

16 1. The deadline for filing any Motion to Stay shall be extended to **Tuesday,**
17 **February 21, 2006**, or to a date three weeks after Plaintiff's actual production of its Document
18 Production Accompanying Disclosure, whichever date is later.

19 SO STIPULATED.

20 Dated: January 24, 2006

MOUNT & STOELKER P.C.

21
22 By _____

Bobby T. Shih for Plaintiff
PHOTOFLEX PRODUCTS, INC.

1 Dated: January 25, 2006

SEDGWICK, DETERT, MORAN & ARNOLD LLP

2
3 By

James Yuanxin Li for Defendant
CIRCA 3 LLC dba AMVONA.COM

4
5 **IT IS SO ORDERED.**

6 Dated: January 25, 2006

7 By

JEFFREY S. WHITE
UNITED STATES DISTRICT JUDGE